

EXHIBIT 1

From: Kim Bowlin <kim@surgerycentercumberland.com>
Sent: Tuesday, October 16, 2012 2:27 PM
To: C. J. Gideon; JEFF WOODS; Matt H. Cline
Subject: Massachusetts

Matt,
Senior Managers, Ron & Gina Calisher whom you met in person last week wanted me to ask this question of you. I don't really understand the question so I may not be asking this correctly, but, they want to know [REDACTED] [REDACTED]. They were telling me this would matter as to what defense we would take.

Kim

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From: Matt H. Cline
Sent: Friday, October 26, 2012 5:03 PM
To: Kim Bowlin; 'Kenneth Lister M. D'; 'Jon Simpson M.D.'
Subject: Other Insurance Coverage

All:

If this has not been discussed amongst you yet, I wanted to mention that, [REDACTED]

[REDACTED], I recommend you [REDACTED] and, if necessary, [REDACTED]

[REDACTED] but this is something that I recommend you at least think about.

Thanks – let me know if you have any questions.

Matthew H. Cline
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From: Matt H. Cline
Sent: Friday, October 12, 2012 5:32 PM
To: Kim Bowlin; 'Kenneth Lister M. D'; jean@surgerycentercumberland.com
Cc: Chris J. Tardio; Cindy Alexander
Subject: Litigation Hold

Personal and Confidential / Attorney-Client Communication

All:

As mentioned during the [REDACTED], I recommend that you

Thanks.

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From: Matt H. Cline
Sent: Friday, January 25, 2013 4:56 PM
To: Dr. Don Jones; sycspng@comcast.net; Kim Bowlin
Cc: Tracy A. Palubicki; Chris J. Tardio
Subject: Update - Meningitis Cases
Attachments: Memo re Bankruptcy Schedules - mhc 1-25-13.doc

Personal and Confidential // Attorney-Client Privilege

All:

New developments from the past couple of weeks are outlined below.

Meeting Request from Assistant U.S. Attorney Prosecuting NECC

[REDACTED]

NECC Bankruptcy Developments

[REDACTED]

Consolidation of Cases against NECC for Multidistrict Litigation

[REDACTED]

• [REDACTED]
[REDACTED]

We will continue to keep you updated on new developments. Please do not hesitate to contact me if you have any questions.

Thanks.

Matt

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MEMORANDUM

TO: SVM-1022

FROM: Matt Cline

DATE: 1/25/13

RE: NECC Bankruptcy Schedules

The following memo summarizes information obtained from NECC's 208 page bankruptcy schedules in which it discloses its assets, liabilities, creditors, and disbursements for the previous year.

Revenue

[REDACTED]

[REDACTED]

Assets

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Liabilities

The figure consists of a series of horizontal black bars of varying lengths and positions. The bars are arranged in several distinct horizontal groups. The top group contains a long bar on the right and a shorter bar on the left. Below this is a group of small, closely spaced bars. A single short bar is positioned below the first group. The third group from the top is the longest, consisting of a very long bar on the left and a shorter bar on the right. The fourth group is a single long bar. The fifth group is a single bar with a small segment removed from its left side. The bottom group is a single long bar.

- **Highly effective**
- **Effective**
- **Somewhat effective**
- **Ineffective**
- **Very ineffective**

Disbursements in Previous Year:

ANSWER

Digitized by srujanika@gmail.com

[REDACTED]

[REDACTED]

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A horizontal bar chart consisting of five solid black bars of different widths. The bars are arranged from top to bottom in descending order of length. The first bar is the longest, followed by a shorter bar, then a very long bar, then another short bar, and finally the shortest bar at the bottom.

ANSWER The answer is 1000.

ANSWER